

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:

Luke W. Aaron and
Alisha M. Aaron, Debtors

Bankruptcy No.: 20-20180-CMB
Chapter 13

Luke W. Aaron and
Alisha M. Aaron, Movants
v.

Nationstar Mortgage LLC, d/b/a Mr. Cooper and
Ronda J. Winnecour, Chapter 13 Trustee, Respondents

DEBTORS' DECLARATION REGARDING MORTGAGE PAYMENT CHANGE

AND NOW, comes the Debtors/Movants Luke W. Aaron and Alisha M. Aaron, by and through their counsel Michael S. Lazaroff, Esquire, and respectfully represent as follows:

1. Respondent Nationstar Mortgage LLC, d/b/a Mr. Cooper filed a *Notice of Mortgage Payment Change* at Claim 22 in the above captioned Chapter 13 case.
2. Debtors and undersigned counsel hereby declare that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt because, in this case, the *Notice of Mortgage Payment Change* shows that the total monthly payment is decreasing due to escrow account revisions.

Respectfully submitted,

/s/ Michael S. Lazaroff

Michael S. Lazaroff, Esquire
PA ID No. 204494

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Counsel for Debtors

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CERTIFICATE OF SERVICE

I, Michael S. Lazaroff, Esquire, of 277 West Main Street, PO Box 216, Saxonburg, PA 16056

CERTIFY:

That I am at least 18 years of age;

That on the 23rd day of December, 2021, I served a copy of the *Debtors' Declaration Regarding Mortgage Payment Change* filed in this proceeding on:

Office of the U.S. Trustee
via CM/ECF e-mail noticing

Ronda Winnecour, Esquire
Chapter 13 Trustee
via CM/ECF noticing

Brian C. Nicholas, Esq. (counsel for Mr. Cooper)
via CM/ECF e-mail noticing

I certify under the penalty of perjury that the foregoing is true and correct.

Executed on: December 23, 2021

/s/ Michael S. Lazaroff
Michael S. Lazaroff, Esquire
PA ID No. 204494

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